

SEALED

DJB/MLARS: USAO#2021R0089-TLF

FILED
U.S. DISTRICT COURT
DISTRICT OF MARYLANDIN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

2021 AUG -3 PM 3:06

CLERK'S OFFICE
AT BALTIMORE

UNITED STATES OF AMERICA

v.

RYAN FARACE and
JOSEPH FARACE

Defendants.

CRIMINAL NO.

(Conspiracy to Commit Money
Laundering, 18 U.S.C. § 1956;
Forfeiture, 18 U.S.C. § 982 and
21 U.S.C. § 853)BY MD DEPUTY
CCB 21 CR 294

INDICTMENTCOUNT ONE

The Grand Jury for the District of Maryland charges that:

1. Defendant **RYAN FARACE** was from, at least 2013 to November 2018, a resident of Maryland. Since in or about November 2018, **RYAN FARACE** has been incarcerated at a federal correctional institution located outside of Maryland.
2. At all relevant times, Defendant **JOSEPH FARACE** was a resident of Maryland.
3. In November 2018, **RYAN FARACE** was convicted of one count of conspiracy to manufacture, distribute, and possess with the intent to distribute alprazolam, a Schedule IV controlled substance, in violation of the Controlled Substances Act, 21 U.S.C § 846, and one count of conspiracy to commit money laundering, in violation of 18 U.S.C. § 1956(h).
4. As part of the sentence for his 2018 convictions, **RYAN FARACE** was ordered to forfeit cash, digital currency, and various items of personal property. **RYAN FARACE** was also subject to a forfeiture money judgment of \$5,665,000 U.S. dollars and 4000 bitcoins, which constituted property derived from or involved in **RYAN FARACE's** unlawful drug trafficking and money laundering activities.

The Charge

5. From at least October 2019 until in or about April 2021, in the District of Maryland and elsewhere, the Defendants,

**RYAN FARACE and
JOSEPH FARACE,**

knowingly combined, conspired, confederated, and agreed with each other and with other persons known and unknown to the Grand Jury to commit money laundering, in violation of Title 18, United States Code, Section 1956, to wit, to knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, which transaction involved the proceeds of specified unlawful activity—that is, conspiracy to manufacture, distribute, and possess with the intent to distribute alprazolam, a Schedule IV controlled substance, in violation of Title 21, United States Code, Section 846—knowing that the property involved in the financial transaction represented the proceeds of some form of unlawful activity and that the transaction was designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of said specified unlawful activity, all in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

18 U.S.C. § 1956(h)

FORFEITURE NOTICE

Pursuant to Rule 32.2, notice is hereby given to the Defendants that the United States will seek forfeiture as part of any sentence in accordance with Title 21, United States Code, Section 853, in the event of the Defendants' convictions under Count One of this Indictment.

Money Laundering Forfeiture

1. Upon conviction of the offense alleged in Count One, the Defendants,

**RYAN FARACE and
JOSEPH FARACE,**

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), any property, real or personal, involved in such offense, and any property traceable to such property, including, but not limited to:

- a. 2874.904256 bitcoin seized on or about February 10, 2021 (Asset ID 21-DEA-674483);
- b. 58.742155166 bitcoin seized on or about May 11, 2021 (Asset ID 21-DEA-678181); and
- c. A sum of money equal to the value of the property involved in the offense.

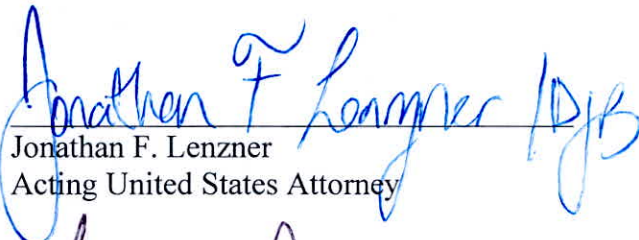
Substitute Assets

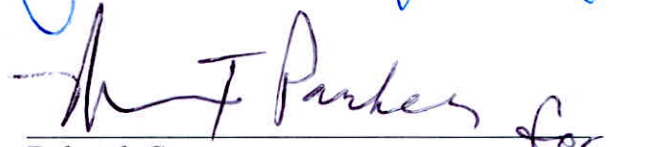
2. If, as a result of any act or omission by the Defendants, any such property subject to forfeiture:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been comingled with other property which cannot be subdivided without difficulty,

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 982(b)(1), to seek forfeiture of any other property of the Defendants up to the value of the property subject to forfeiture as set forth in the paragraph above.

18 U.S.C. § 982(a)(1) and (b)(1)
21 U.S.C. § 853(p)


Jonathan F. Lenzner
Acting United States Attorney


Deborah Connor
Chief
Money Laundering and Asset Recovery Section
Criminal Division

A TRUE BILL:

SIGNATURE REDACTED

FOREPERSON

8/3/2021
DATE